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Data Collection Embedded Explanations for SA 401722

Intrastate	Revised switched access rate tariffs will be filed during the week of September 17th that will reflect the new local switching rate shown in the TRP for both Ritter Telephone Company and Tri-County Telephone Company.

NECA CAF UPDATE 9-10-12: INTRASTATE BASE PERIOD REVENUE EXPLANATION

1. **Describe the method for ensuring that the revenue is strictly attributable to intrastate terminating switched access revenue. Describe methods used for segregating traffic between jurisdictions and services. Include a list of billable elements or revenue sources.**

Ritter Telephone has a LTR rate structure for intrastate access. To determine the intrastate revenue for the Fiscal Year ending September 30, 2011, Ritter Telephone determined the demand by rates element from billing report for the period. The billing report provided demand and revenue per rate element for the October 2010 though September 2011. The billing reports segregated interstate originating and terminating minutes and revenues and also intrastate originating and terminating minutes and revenues. Direct trunks are separated only by intrastate and interstate but not originating and terminating. The rate elements included in the report are:

Carrier Common Line

Local Switching

DA Surcharge

Residual Interconnection Charge

Tandem Switching

Tandem Transport Facility

Tandem Transport Termination

Direct Trunk Termination

Direct Trunk Facility

The rates used to determine the revenue are listed in the company's state access tariff in effect as of 12-29-2011. The work sheet attached to the data submission details the calculation for the state rates in effect as of December 29, 2011 and also the state rates filed effective July 2012. The work sheet links to the TRP inputs provided to the NECA input.

The worksheet also shows how the non-LTR rate elements are mapped to the LTR rate elements. The demand for the transport using LTR is equal to the number of minutes of demand times the billed mileage for the Tandem transport facility or the number of terminations for the tandem transport termination. The non-LTR rate is equal to the state revenue divided by the LTR demand units.

2. A carrier must document that revenues strictly apply to fiscal year 2011 (October 1, 2010-September 30, 2011). A carrier must document if and how it excluded any revenues received in fiscal year 2011 that were not associated with the demand for the fiscal year 2011.

   To determine the actual collected revenues as of March 31, 2012, Ritter Telephone matched the bills for the fiscal period to the outstanding balances associated with the specific bills for the period. Ritter Telephone could not determine the individual rate elements that were paid so reduced the collected revenue based on the percentage of uncollected revenue to total revenue in the fiscal period. Therefore, revenue is limited to the revenue generated by the terminating access elements billing within the fiscal year only.

3. Base period revenue must be received revenues (net received for reciprocal compensation). If billing cycle adjustments were made to calendarized data, the methodology must be described. For example, if the first billing cycle overlaps FY2010 and FY 2011, the carrier must describe how it assigned the revenue to both fiscal years and document the reasonability of the approach. If collectible aging factors were used to estimate received revenues, the method must be documented and the carrier must explain why it had to resort to an indirect method.

   To capture the data for the Fiscal Year October 1, 2010 through September 30, 2011, our CABS vendor first created three files from the following time periods: The first file removed September 21, 2010 through September 30, 2010 data from our normal monthly November billing cycle of September 21st through October 20, 2010. This created a data file for the period October 1st through October 20th. Secondly the vendor captured the next 11 normal billing month's data for the months of December 2010 through October 2011. This created a file for the period of October 21, 2010 through September 20, 2011. The last file captured data for the period of September 21st through September 30, 2011 from the normal monthly November 2011 billing cycle. Combining the data from these three produces a data file for the total usage from the period October 1, 2010 through September 30, 2011.

4. Revenue received comports with the March 31, 2012 cutoff. A carrier must demonstrate that it has not added revenue received after the cutoff point.

   As described in response of # 2, the collected revenue is based on the percentage of revenue collected on invoices rendered between Oct 2011 and Sept 2012. This percentage is based only on the revenue received by March 31, 2012.

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